

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No.: 22-CR-223 (12) (NEB/TNL)

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
vs.)	MOTION TO ALLOW TRAVEL BY
)	DEFENDANT
)	
Hamdi Hussein Omar,)	
)	
)	
Defendant.)	

The defendant, Hamdi Hussein Omar, respectfully moves the Court for an Order allowing her to travel to Saudia Arabia for Hajj. Specifically, Ms. Omar seeks an order to return her passport and to allow her travel to Saudi Arabia from January 24, 2024, and returning on February 13, 2024. Counsel for Ms. Omar has obtained her specific travel itinerary including her proposed flights and hotel information if requested. Ms. Omar will be traveling with her mother, who has ongoing health concerns requiring some degree of assistance by Ms. Omar.

Counsel has spoke with Mr. Joseph Thompson the AUSA of record regarding this request and he opposes it, citing among other reasons that the United States has no extradition treaty with Saudi Arabia. Counsel states upon information and belief

that Ms. Omar has to date been in compliance with all the terms of her conditional release in this matter.

Respectfully submitted,

Dated: This 21st day of December, 2023

/s/ **Robert M. Paule**

Robert M. Paule (#203877)

Robert M. Paule, P.A.

920 Second Avenue South

Suite 975

Minneapolis, MN 55402

T: (612) 332-1733

F: (612) 332-9951